1 THE HONORABLE TANA LIN 2 3 4 5 6 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 8 9 10 11 JESSE G. COOPER, in his Personal Capacity CASE NO. 2:20-cv-01196-TL 12 and as Personal Representative of the Estate of PAULA LEE JEFFERSON, deceased; et al., 13 STIPULATED MOTION TO Plaintiffs, **EXPAND PAGE LIMIT FOR** 14 PLAINTIFF'S COMBINED RESPONSE IN OPPOSITION TO 15 **DEFENDANTS' MOTIONS FOR** WHATCOM COUNTY, a political subdivision **SUMMARY JUDGMENT** 16 of the State of Washington; et al., NOTE ON MOTION CALENDAR: 17 MARCH 9, 2022 Defendants. 18 THE PARTIES, by and through their respective counsel, hereby certify that they met, 19 conferred and agreed, pursuant to Local Rule 7(d)(1), to jointly move this Court for an Order to 20 grant leave for Plaintiffs to file a brief exceeding twenty-four pages in a combined response to 21 Defendants' Motions for Summary Judgment. The Parties stipulate and agree as follows: 22 23 24 STIPULATED MOTION TO EXPAND PAGE LIMIT FOR PLAINTIFF'S Galanda Broadman PLLC COMBINED RESPONSE IN OPPOSITION TO DEFENDANTS' MOTIONS 8606 35th Avenue NE, Ste. L1 25 FOR SUMMARY JUDGMENT- 1 Mailing: P.O. Box 15146 Seattle, WA 98115 (CASE NO. 2:20-CV-01196-TL)

(206) 557-7509

1	1. Counsel for Plaintiffs hereby certifies that on March 9, 2022, he conferred with al
2	other Parties, to reach agreement on Plaintiff's need to file the Combined Response to Defendants
3	Motions for Summary Judgment in excess of the page limit required by Local Rule 7(e)(3).
4	2. Plaintiffs reasonably believe that an additional eleven (11) pages is necessary to
5	promote efficiency and enable them to fairly and adequately respond in a combined manner to
6	Defendants' Motions for Summary Judgment.
7	3. The Parties submit that there is no prejudice to Defendants created by the relie
8	requested herein.
9	4. In consideration of these communications the Parties therefore stipulate to the filing
10	of the agreed Order below, providing an additional eleven (11) pages for a combined response brief
11	not to exceed a total of thirty-five (35) pages.
12	Respectfully submitted this 9th day of March, 2022.
13	IT IS SO STIPULATED:
14	
15	By: GALANDA BROADMAN, PLLC
16	<u>s/Ryan D. Dreveskracht</u> Ryan D. Dreveskracht, WSBA #42593
17	Attorney for Plaintiffs P.O. Box 15146
18	Seattle, WA 98115 (206) 557-7509
19	ryan@galandabroadman.com
20	JOHNSON GRAFFE KEAY MONIZ & WICK, LLP
21	s/ D. Jeffrey Burnham
22	D. Jeffrey Burnham, WSBA #22679 925 Fourth Ave., Ste. 2300
23	Seattle, WA 98104 (206) 223-4770
24	STIPULATED MOTION TO EXPAND PAGE LIMIT FOR PLAINTIFF'S Galanda Broadman PLLC
25	COMBINED RESPONSE IN OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT- 2 (CASE NO. 2:20-CV-01196-TL) 8606 35th Avenue NE, Ste. L1 Mailing: P.O. Box 15146 Seattle, WA 98115 (206) 557-7509

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2	LAW, LYMAN, DANIEL, KAMERRER & BOGDANOVICH, P.S.
3 4	<u>s/ John E. Justice</u> John E. Justice, WSBA No. 23042 2674
5	R.W. Johnson Rd. Tumwater, WA 98512 (360) 754-3480
6	jjustice@lldkb.com
7	WHATCOM COUNTY PROSECUTING ATTORNEY
8	s/ George Roche George Roche, WSBA #45698 311 Grand Ave Suite 201 Bellingham, WA
9	98225 360.778.5710 groche@co.whatcom.wa.us
10	
11	MURPHY PEARSON BRADLEY & FEENEY
12	<u>s/ Nicholas C. Larson</u> Nicholas C. Larson WSBA #46024 1455 NW
13	Leary Way, Ste 400 Seattle WA 98107 (206) 489 5113
14	nlarson@mpbf.com GALANDA BROADMAN, PLLC
15	[PROPOSED] ORDER
16	
17	Pursuant to the Stipulation above, IT IS HEREBY ORDERED that the Stipulated Motion
18	for Expansion of Page Limits in Response to Defendants' Motion for Summary Judgment is
19	GRANTED. Plaintiffs shall be entitled to an additional eleven (11) pages to respond to Defendants
20	Motions for Summary Judgment.
21	DATED this <u>10th</u> day of <u>March</u> , 2022.
22	Vana St.
23	Tana Lin
	United States District Judge
24 25	STIPULATED MOTION TO EXPAND PAGE LIMIT FOR PLAINTIFF'S COMBINED RESPONSE IN OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT- 3 (CASE NO. 2:20-CV-01196-TL) Galanda Broadman PLLC 8606 35th Avenue NE, Ste. L1 Mailing: P.O. Box 15146 Seattle, WA 98115 (206) 557-7509

1 **CERTIFICATE OF SERVICE** 2 I, Wendy Foster, declare as follows: 3 1. I am now and at all times herein mentioned a legal and permanent resident of the 4 United States and the State of Washington, over the age of eighteen years, not a party to the above-5 entitled action, and competent to testify as a witness. 6 I am employed with the law firm of Galanda Broadman PLLC, 8606 35th Avenue 2. 7 NE, Ste. L1, Seattle, WA 98115. 3. I served the foregoing on the following, via the Court's ECF filing system: 8 George Roche Nicholas C. Larson 9 Whatcom County Prosecutor's Office Jason E. Fellner 311 Grand Avenue Suite 201 Alexandrea M. Tomp 10 Bellingham, WA 98225 Murphy Pearson Bradley & Feeney 1455 NW Leary Way, Ste 400 11 Seattle WA 98107 John E. Justice Lay, Lyman, Daniel, Kamerrer & Bogdanovich, P.S. 12 2674 R W Johnson Boulevard SW Tumwater, WA 98512 13 D. Jeffrey Burnham 14 925 Fourth Avenue Suite 2300 Seattle, WA 98104 15 The foregoing statement is made under penalty of perjury and under the laws of the State of 16 Washington and is true and correct. 17 Signed at Seattle, Washington, this 9th day of March, 2022. 18 19 20 s/Wendy Foster Wendy Foster 21 22 23 24 STIPULATED MOTION TO EXPAND PAGE LIMIT FOR PLAINTIFF'S Galanda Broadman PLLC COMBINED RESPONSE IN OPPOSITION TO DEFENDANTS' MOTIONS 8606 35th Avenue NE, Ste. L1 25 FOR SUMMARY JUDGMENT- 4 Mailing: P.O. Box 15146 Seattle, WA 98115 (CASE NO. 2:20-CV-01196-TL) (206) 557-7509